

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

GEORGE RAMIREZ,

Defendant.

NO. CR23-189JCC

PROTECTIVE ORDER
[PROPOSED]

1. Defendant George Ramirez made his initial appearance on November 27, 2023, and was ordered detained pending trial for this matter.

2. This Protective Order governs the below described discovery material in any format (written or electronic) that is produced by the government in discovery in the above-captioned.

3. **Protected Material.** Materials so designated by counsel for the United States that contain personal identifying information about individuals not party to this litigation, where due to the nature of the underlying discovery material and the charged crimes the government does not believe redaction can reasonably address the same confidentiality concerns. Redacting the discovery to delete personal identifying information (PII) would unnecessarily delay the disclosure of discovery to the defendant

1 and would frustrate the intent of the discovery process. For the purposes of this order, the
2 materials described in paragraph 2 are collectively, “Protected Material.”

3 4. **Designations.** The government shall mark materials containing PII from as
4 “Protected Material.”

5 5. **Defense Team.** For the purposes of this order, “Defense Team” shall be
6 limited to attorneys of record for the defendant and any of the following people working
7 on this matter under the supervision of the attorneys of record: attorneys, investigators,
8 paralegals, law clerks, testifying and consulting experts, and legal assistants. For purposes
9 of this Order, “Defense Team” does not include the defendant. Defendant’s attorneys shall
10 inform any member of the Defense Team to whom disclosure of discovery material is made
11 of the existence and terms of this Protective Order. Members of the Defense Team shall
12 not provide copies of any discovery material marked “Protected Material” to any persons
13 outside of the Defense Team, except as specifically set forth below.

14 6. **Restricted Access.** Members of the Defense Team shall retain custody of
15 all copies of the Protected Material, except as discussed below in paragraph 7. Members
16 of the Defense Team shall use Protected Material only for the purpose of preparing a
17 defense to the charges in this action. Members of the Defense Team may review the
18 Protected Material with the defendant and witnesses for purposes of trial preparation,
19 provided that witnesses may review the Protected Material only in the presence a member
20 of the Defense Team and may not take notes regarding the content of the Protected
21 Material.

22 7. While held at the Federal Detention Center (FDC), the defendant will be
23 permitted to review the Protected Material, consistent with the regulations established by
24 the BOP and with his counsel in a controlled environment at the FDC, but will be prohibited
25 from printing out, copying, or disseminating the Protected Material. Defendant is
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1 prohibited from maintaining a copy of the Protected Material or any notes made while
2 reviewing that material, in his cell.

3 8. Any discovery material containing personal identifying information or
4 personal financial information that the Defense Team files with the Court in connection
5 with pre-trial motions, trial, or other matters before the Court, shall either be redacted to
6 remove the personal identifying information, or shall be filed under seal and shall remain
7 sealed until otherwise ordered by the Court.

8 9. This Protective Order may be modified, as necessary, by filing with the Court
9 a Stipulated Order Modifying the Protective Order or by order of the Court.

10 DATED this 16th day of January 2024.

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John C. Coughenour
UNITED STATES DISTRICT JUDGE

Presented by:

/s/ Crystal C. Correa
CRYSTAL C. CORREA
Assistant United States Attorney